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VIA ELECTRONIC MAIL

TO: Milagro Elizabeth Cooper, a.k.a. Milagro Gramz,
FROM: Alex Spiro, Quinn Emanuel Urquhart & Sullivan, LLP
DATE: October 29, 2024
RE: Notice of Claims and Preservation of Documents and Information

Introduction and Executive Summary

We are filing a civil action against you, Milagro Elizabeth Cooper (also known as Milagro Gramz or Mobz World), concerning your campaign of harassment and cyberbullying and the false comments you have made regarding Megan Pete (also known as Megan Thee Stallion), including with regard to the criminal case and appeal of the People of the State of California v. Daystar Peterson (BA490599) (the “Case”).

For years, you and other bloggers have acted on behalf of Mr. Peterson (aka Tory Lanez) as an online rumor mill churning out falsehoods about Ms. Pete to your tens of thousands of social media followers. You and other bloggers are a mouthpiece and puppet for Mr. Peterson, with a vendetta against Ms. Pete committed to tearing her down at all costs regardless of the truth. Since Mr. Peterson was indicted in 2020 for felony assault with a deadly weapon after shooting Ms. Pete, to his later conviction in December 2022, up through today, you have done Mr. Peterson’s public bidding to denigrate, belittle, insult, and spread false and defamatory statements about Ms. Pete on your online platform, for no other reason than to bully, harass and punish Ms. Pete for Mr. Peterson’s conviction and to tarnish her reputation, causing emotional distress.

Plaintiff is aware of your conspiratorial relationship with Mr. Peterson and knows you are a paid surrogate of Mr. Peterson. Your conduct has repeatedly confirmed this. Indeed, you promoted the debunked theory that Mr. Peterson did not shoot Plaintiff, when all of the evidence proved otherwise and your theory repeatedly debased. You described Plaintiff as an “angry black woman” and a “lying ass hoe.” You accused her of having “a severe drinking problem” who

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“needs to spend more time in a relationship with herself and her therapist and maybe AA.” You regularly enlist “bot” X accounts to attack and harass Plaintiff’s fans and supporters whenever they challenge your false statements about Plaintiff. You even questioned Plaintiff’s competency, asking your followers whether Plaintiff “ha[s] a guardian or no?” and whether Plaintiff has “ever been deemed, like legally retarded?” When Plaintiff asked how to get bloggers like you to stop making false and demeaning posts about her, you responded that Plaintiff should “just get over it, or go away.”

Your misconduct reached new heights earlier this year in June 2024 after you promoted a deepfake video featuring an artificially created image of Ms. Pete engaging in sexual acts without her knowledge or consent (the “Video”). Not only did you “like” a post that shared access to the Video, but you then shared a post on your X account encouraging users to “[g]o to my likes”, where they could obtain access to the Video. Your actions violated Florida law for the promotion of an altered sexual depiction.

Your latest grift involves spreading the false and outlandish claim that the firearm Mr. Peterson used to shoot Ms. Pete has “gone missing,” and falsely suggesting that because it went missing that is why the firearm itself was not presented in court.

Putting aside that the firearm was simply one piece in a mountain of evidence presented by the State against Mr. Peterson—which resulted in a unanimous guilty conviction beyond reasonable doubt—there is simply no basis in truth or fact for your patently false claims. Indeed, the firearm remains in the custody of the Los Angeles Police Department, the truth of which you recklessly disregarded in perpetuating this lie. Nothing prevents Mr. Peterson or his lawyers from testing the firearm. Tellingly, you waited *mere days* before Ms. Pete’s planned documentary released to the public to spin your latest web of lies by amplifying the falsehood that the firearm is missing when it is not. Ms. Pete is confident that the California appellate court will deny Mr. Peterson’s appeal and writ.

Through this letter, we are putting you on notice of the claims and procedures for preserving and retaining potentially relevant information. The civil claims filed against you include but are not limited promotion of an altered sexual depiction, cyberstalking, intentional infliction of emotional distress, invasion of privacy: false light, and injunctive relief for your campaign of harassment against Ms. Pete. Ms. Pete reserves the right to amend her complaint to include additional causes of action based on your misconduct, such as defamation.

The procedures described in the following directive (the “Notice”) must be followed.

It is critical that you retain without alteration all documents and information related in any way to the subjects described herein in whatever form they exist, whether hard copy or electronic, maintaining intact all metadata associated therewith.

For purposes of this Notice, the phrase “documents and information” should be interpreted broadly to include, but not be limited to, all forms of written, printed, electronic or recorded matter,

including, but not limited to, letters, memoranda, files, emails, databases, spreadsheets, presentations, notice, voicemails, text messages, instant messages on any platform, video or audio tapes or recordings, calendars, photographs, drawings, logs, lists, tables, agendas, charts, slides, presentation materials, correspondence, facsimiles, photocopies and the like.

I. Documents and Information that Must be Retained

Relevant documents and information include any material that refer or relate in any way to the following:

- (1) Any and all communications regarding Megan Pete, including but not limited to drafts and final published posts appearing on blog sites and social media platforms under the usernames Milagro Gramz, MobzWorld, or Mob Radio;
- (2) Any and all communications with or regarding Daystar Peterson;
- (3) Any and all communications with or regarding Sonstar Peterson;
- (4) Any and all communications with or regarding Kelsey Harris;
- (5) Any and all communications with or regarding Jaquan Smith;
- (6) Any and all communications with Livingston Allen (also known as DJ Akademiks) regarding Megan Pete, Daystar Peterson, or the Case;
- (7) Any and all documents exchanged between you and Daystar Peterson's attorneys, including but not limited to Shawn Holley, George Mgdesyan, Jose Baez and Crystal Morgan;
- (8) All documents sufficient to show recordings of episodes from your podcast titled "Mob Radio" about Megan Pete, Daystar Peterson, or the Case.

II. Directive Regarding Preservation and Retention of Documents and Electronic Data

Effective immediately, we are asking you to take any appropriate steps you have not already taken to preserve and retain any documents or information that are or may be relevant to the potential claims described above. You should refrain from alteration, destruction and/or disposal of potentially relevant documents or information. Regardless of any documentation retention/destruction policies that may be applicable, do not discard, destroy, alter or delete any such materials until further notice.

You should review your Inbox, Sent Items, Deleted Items, and other folders for relevant e-mails. You should also preserve any relevant materials stored on your hard drive and relevant shared drives.

This directive applies to all devices, locations, and sources of information, including but not limited to laptops, computers, smartphones, tablets, handheld devices, mobile phones, and other hardware (*e.g.*, USB flash devices), storage location of personnel who take work-related information home, network shared drives, and email servers. This directive applies to all documents regardless of whether such documents are stored at home or work, and regardless of whether such documents and electronic data are stored in "official" or "personal" files. Please preserve drafts and/or multiple copies of the same documents, if you have them, even if they appear to be identical.

Equipment that may contain relevant or potentially relevant documents or electronic data should not be discarded. No new software should be installed on any equipment if it may result in the deletion or alteration of documents. Any automatic purge programs that would result in deletion or destruction of relevant documents should be suspended immediately and until further notice.

In particular, this Notice also overrides any automatic deletion protocol of the files of terminated employees.

III. Duration

As the claims in this potential civil action progress, changes in circumstances may require future modification or expansion of the categories of documents to be retained. It is important that you do not destroy or discard any potentially responsive documents until you are informed that the hold is no longer in effect.

If you have any questions regarding this Notice, please contact Alex Spiro at Quinn Emanuel at alexspiro@quinnemanuel.com or at 212-849-7364.

A handwritten signature in dark ink, appearing to be 'AS' followed by a horizontal flourish.

Alex Spiro